



**Montana**  
**Office of Public Instruction**  
Denise Juneau, State Superintendent

**opi.mt.gov**

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February 19, 2010

Gene Wilhoit, Executive Director, CCSSO  
One Massachusetts Ave, NW, Suite 700  
Washington, DC 20001-1431

Dear Mr. Wilhoit:

Montana's educators and I appreciate the opportunity to provide feedback on the draft of the K-12 mathematics and English language arts standards. We also appreciated the opportunity to participate in the conference calls that allowed the states to offer feedback. This provided clarity to the revision process, insight to other states' comments, and clarification on the writing team's intent.

Montana is striving to make this process as transparent as possible to its educational community, as well as the public. A panel of dedicated, well respected elementary, middle, and secondary educators, along with university professors, continue to give of their time and expertise to thoroughly review the K-12 Common Core draft standards. Once the state receives the final standards document, we will conduct an alignment study of the Common Core Standards and the Montana Content Standards.

The review panel and I are pleased with the revisions that have been made to prior drafts. Our recommendations are more focused because the format and organization of the document is improving. As the draft standards are revised, the review team looks forward to further improvements that incorporate state input. I am suggesting an extended public comment period as it would be beneficial to the integrity and acceptance of the documents.

On behalf of all the students of Montana, I would like to thank you for reviewing and incorporating the suggestions from the Montana mathematics and English language arts review teams. If more information is needed, please contact Assistant Superintendent Nancy Coopersmith at [ncoopersmith@mt.gov](mailto:ncoopersmith@mt.gov) or (406) 444-5541.

Sincerely,

Denise Juneau  
State Superintendent

Attachments

## **Montana Communication Arts response to February 8, 2010 draft “College- and Career-Ready Standards for Reading, Writing, Speaking, Listening, and Language with K-12”**

Although Montana is the only state that constitutionally mandates educational systems to include American Indians in our educational goals, Montana would hope that all states embrace and include the culture of their unique populations in the implementation of standards. After all, education is a human endeavor with scientific, social and cultural relevance. Relevant cultural context should be addressed in a section placed between the introduction and the section on Serving Students with Special Needs. Suggested language for this section follows.

Learning in a culturally responsive manner and working cooperatively with a state’s local population should be included in our educational goals. The benefits of relevant cultural context in instructional practices include an increase in accuracy and authenticity of resources, opportunities to engage students, and the inclusion of cultural perspectives. It helps us to eradicate bias and stereotypes and increases awareness and acceptance for people of all cultural backgrounds. By including cultural perspectives in our instruction, we open the door for the inclusion of all students’ identities.

As rationales are developed for relevant cultural context in implementing the standards, include ethical and instructional components.

Four questions to consider when implementing the standards in a culturally responsive manner:

1. How will culturally relevant content be used to support instructional objectives?
2. What is the rationale for incorporating culturally relevant content in instruction?
3. What culturally responsive practices will be used to ensure quality instruction for all students?
4. How will these practices be integrated throughout implementation of the standards?

### **Appreciate**

- The change in format from previous drafts;
- the literacy applications to science and social studies;
- the definition of text complexity, the three factors considered when measuring text complexity, and the promise of a Web site for accessing complexity information and additional resources.

### **Concerns**

- Language is not always clear. For example, page 13, 4<sup>th</sup> grade, #2 “Outline main ideas in a text and the details that support them.” The term outline is unclear; does it mean a formal outline or a summary? Page 13, 4<sup>th</sup> grade, #10 “Demonstrate the capacity to read informational text independently within the grades 4-5 text complexity band ...” It is unclear how the students would demonstrate this skill.
- Reading foundations conclude at third grade. As text complexity increases, students need to be given additional instruction on decoding multisyllabic words and strategies for comprehension. The elements/strategies students need to employ when they encounter more difficult text are missing from the standards: adjust fluency, predict, ask questions, monitor comprehension, and activate prior knowledge.

- Grain size of skills is not always consistent. For example, page 51, Grade 7, #1 a. “Chose among simple, compound, complex, and compound-complex sentences to signal differing relationships among ideas.” Grade 7, #2 a. “Use a comma before a coordinating conjunction in a compound sentence.”

## **Recommendations**

- It is imperative that the math and English/language arts documents have consistent format and use of language, “How to Read this Document “section in mathematics and English/language arts should be parallel.
- Increase the time line for public comment to at least 4 weeks.
- The standards must have more emphasis on creativity in the writing process.
- Add more writing modalities. The current writing standards are limiting.
- Reference NAEP 2011 writing framework:  
[nagb.org/publications/frameworks/2011naep-writing-framework.doc](http://nagb.org/publications/frameworks/2011naep-writing-framework.doc).
- Revisit the learning progression regarding spelling; as the concept progresses the learning required is missing. Beginning at sixth grade, the standard is “spell correctly.” This standard is not indicative of what concepts or skills students must have to meet this expectation at each grade level. Should a student beginning in sixth grade spell 100% of words correctly? The standard is very unclear as to what degree it should be measured at each grade level.

## **Montana's response to February 8, 2010 draft "Mathematics Common Core State Standards Initiative"**

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As rationales are developed for relevant cultural context in implementing the standards, include ethical and instructional components.

Four questions to consider when implementing the standards in a culturally responsive manner:

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### **Appreciation**

- ADV label in the 9-12 portions helps us distinguish between what all students need vs. college intending in math related careers.
- The 3-4 critical clusters in the K-8 portion that indicate the instructional focus per grade level is appreciated.
- Mathematical Practices is similar to Montana Performance Descriptors. The value of the Mathematical Practices will be proven if it drives the assessment.
- Because Common Core and Montana Standards are comparable, filling in the gaps seems doable.
- Starting statistics in grade 6 is appropriate and in depth.
- The approach to modeling, embedding it throughout, was a good idea (9-12).
- We like the fact there is more quality and less quantity which is evidence of focused standards.
- The international standards and benchmarks are evident.
- Teachers, as a whole, will not react negatively to these standards.

### **Concerns**

*The Montana Office of Public Instruction provides vision, advocacy, support, and leadership for schools and communities to ensure that all students meet today's challenges and tomorrow's opportunities.*

- Montana developed its standards with an eye on the NCTM Standards. The Common Core appears to avoid the NCTM direction in the 9-12 portions.
- Vertical progression not evident. This is a must.
- By adding Algebra, there is repetition within the expression, equation and function set of skills. Why compress expression and equation in order to have an Algebra standard? States should determine how to bundle the standards.
- The Progression and Grade Ranges Table is missing. Why, because of inappropriate progressions? (e.g., coordinate geometry only in grade 5) We are eager to have appropriate Progression and Grade Range Table.
- Grain size of skills is inconsistent. (e.g., Grade 8 Geometry (d. Use coordinate grids to transform figures and to predict the effect of dilations, translations, rotations and reflections.) is left up to interpretation (only dilation from origin or much more). Other skills are very specific. Grain-size and inconsistency are issues due to a lack of connection between Concepts and Skills.
- Grade 8 seems to be a culminating event with all that is included to address the algebra course in 8<sup>th</sup> grade vs. an eighth grade class issue. Good luck on this issue.
- “Lightning bolts” – the once or twice mentioned or infrequent mentioning of something (e.g., concept of zero, technology, etc). We should be teaching with purpose not just dropping something in once or twice.
- 9-12 portions give license to avoid technology! Technology should be strengthened by embedding in same way as modeling.
- Axioms are missing (dropped from last version). Mentioned in Understanding section and then not in concept or skills list.
- YIKES, page 45 has an error – could say non-concurrent lines could be three parallel lines.

## **Recommendations**

- A vertical K-12 progression between the grade levels is crucial as well as a check for gaps and redundancy (e.g., system of equations from 8-9) Montana could fill the gaps if there is a solid vertical as well as horizontal progression.
- Must have technology included. It will be difficult to identify STEM when there is no technology. Technology should be embedded, similar to modeling.
- It is imperative that the math and English/language arts documents have consistent format and use of language, “How to Read this Document” section in mathematics and English/language arts should be parallel.
- The issue with the level of language may be addressed by indicating a distinction between educator and student vocabulary.
- The Common core needs to be written with an understanding that professional development must be followed through and funded.